

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

| | | |
|---------------------------|---|------------------------------|
| UNITED STATES OF AMERICA, |) | |
| |) | |
| Plaintiff, |) | |
| |) | |
| v. |) | No. 18 CR 278 |
| |) | |
| ERNESTO GODINEZ, |) | Honorable Jeffrey T. Gilbert |
| |) | |
| Defendant. |) | |

**UNOPPOSED MOTION FOR EARLY
RETURN OF RULE 17(C) SUBPOENAS**

NOW COMES the Defendant, ERNESTO GODINEZ, by and through his attorney, LAWRENCE H. HYMAN, and requests that this Honorable Court grant the parties the early return of Rule 17(c) subpoenas prior to trial, and in support hereof, states as follows:

1. Mr. Godinez has been indicted by the United States Government for the alleged shooting of an ATF Officer.
2. Prior to the arraignment, counsel for Mr. Godinez and the Assistant United States Attorney spoke about the early return of subpoenas, but failed to request the Court leave to do so.
3. Counsel for Mr. Godinez has spoken with AUSA Babu, who does not oppose this request.
4. Due to the nature of this case, there will be need for copies of documents prior to trial.
5. This request is made not for the purpose of delay, but to see that justice is served.

WHEREFORE, the Defendant, ERNEST GODINEZ, respectfully requests this
Honorable Court to grant leave to issue 17(c) subpoenas and their early return .

Respectfully submitted,

/s/LAWRENCE H. HYMAN

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